



Federal Communications Commission
Washington, D.C. 20554

May 25, 2017

DA 17-520

John T. Nakahata
Henry Shi
Harris, Wiltshire & Grannis LLP
Counsel for Telcordia Technologies, Inc. d/b/a iconectiv
1919 M Street NW, Eighth Floor
Washington, DC 20036

Rebekah P. Goodheart
David A. Wishnick
Jenner & Block LLP
Counsel for Francisco Partners, LP
1099 New York Ave., NW
Suite 900
Washington, DC 20001

Tara O'Neill Diaz
Executive Vice President & General Counsel
Telcordia Technologies, Inc. d/b/a iconectiv
444 Hoes Lane
Piscataway, NJ 08854

Re: *Request of Telcordia Technologies, Inc. d/b/a iconectiv to Approve Modifications to the Local Numbering Portability Administrator Code of Conduct and the Ericsson Voting Trust, and, if Necessary, the Minority Investment by FP Icon Holdings, L.P.* (WC Docket Nos. 07-149 and 09-109; CC Docket No. 95-116)

Dear Counsel,

On March 31, 2017, Telcordia Technologies, Inc. d/b/a iconectiv, and FP-Icon Holdings, L.P., filed a request for the Commission to approve modifications to the Local Numbering Administrator Code of Conduct and voting trust held by Ericsson Holdings II, Inc., a subsidiary of Telefonaktiebolaget LM Ericsson.¹ To permit the Commission to review this request and make the necessary neutrality and impartiality determinations, we require additional information from parties in interest to this request.

¹ Request of Telcordia Technologies, Inc. d/b/a iconectiv to Approve Modifications to the Local Numbering Portability Administrator Code of Conduct and the Ericsson Voting Trust, and, if Necessary, the Minority Investment by FP Icon Holdings, L.P, WC Docket No. 07-149 et al at 1 (filed Mar. 31, 2017).

Accordingly, pursuant to Section 251(e)(1) of the Act, and 47 C.F.R. § 52.12, we request you provide written responses for each Information Request set forth in the attached Information requests and, where appropriate, amend the Application to reflect such responses. Please respond to the attached Information and Documentation Requests by **June 9, 2017**.

Submit responses to these Information and Documentation Requests in both paper and electronic form, unless only electronic form is specified. Submit responsive documents in electronic form only, unless otherwise specified. Your responses should be filed with Marlene H. Dortch, Secretary, Federal Communications Commission, under the following dockets: WC Docket Nos. 07-149 and 09-109, and CC Docket No. 95-116. We also request that you provide Michelle Sclater, Michelle.Sclater@fcc.gov, and Neil Dellar, Neil.Dellar@fcc.gov, with one copy of all paper and electronic materials filed in response to the Information Requests.

Should you have any questions regarding this matter, please contact Michelle Sclater at 202-418-0388 or Michelle.Sclater@fcc.gov.

Sincerely,

A handwritten signature in black ink that reads "Kris Anne Monteith". The signature is fluid and cursive, with the first name "Kris" being particularly prominent.

Kris Anne Monteith
Chief
Wireline Competition Bureau

Attachment

ATTACHMENT

INFORMATION AND DOCUMENTATION REQUEST

1. Please identify the individual or individuals who advise and manage Francisco Partners (“FP”). With respect to each such individual identified, please state whether they manage any other funds/investments and, if so, whether such other funds/investments are affiliated with Telecommunications Service Providers (each a “TSP”).
2. Please identify the individual(s) who owns the General Partner/corporation that is the ultimate parent of FP. With respect to each such individual identified, please identify their ownership interests in any TSPs.
3. Page 5 of the Request.² Of the 87 portfolio companies in which FP invests, please identify those that are associated with the telecommunications industry (e.g., TSPs, equipment manufacturers, managed service providers etc.) and the size of the investment, in percentage terms, that FP owns, if any.
4. Are any limited partners affiliated with TSPs? If so, please identify the limited partner, the TSP with whom he is affiliated, and the amount of the investment in percentage terms.
5. Please provide a copy of the section(s) of the FP Investors’ Limited Partnership Agreement that provides for the insulation of the limited partners.
6. What is the purpose of the requirement that the Independent Directors be “reasonably acceptable” to FP Investors?
7. The independent directors’ voting power is being reduced from a simple majority to a plurality. Please explain how this reduction in voting power improves iconectiv’s neutrality (assuming that iconectiv needs protection from the influence of Ericsson and FP).
8. Page 9 of the Request refers to FP’s “broad investments.” Please describe in greater detail the nature of FP’s broad investments and how they “...do not present any potential concerns regarding undue influence.”
9. Page 5 of the Request states that FP invested \$10 billion in 87 investments. Page 10 of the Request speaks of \$4 billion invested in 43 companies. Please clarify how much FP currently has invested and in how many investments?

Please provide a copy of the Share Purchase Agreement.

10. Please explain further how the proposed revisions to Section 1.2 of the Voting Trust allow the Trustees to vary the composition of the Board in a way that preserves the ratio of independent directors to other board members as stated on page 18 of the Request?
11. Please explain the purpose and intent of adding Sections 1.3 (h) and (i) to the Voting Trust? Is it anticipated that matters falling within those Sections would be approved by the Commission prior to a vote or is it intended that the Commission would be given notice after the vote?

² See Request of Telcordia Technologies, Inc. d/b/a iconectiv to Approve Modifications to the Local Numbering Portability Administrator Code of Conduct and the Ericsson Voting Trust, and, if Necessary, the Minority Investment by FP Icon Holdings, L.P, WC Docket No. 07-149 et al at 1 (filed Mar. 31, 2017).